

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD)(SN) ECF Case

PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENTS ON BEHALF OF BURNETT/IRAN PLAINTIFFS IDENTIFIED AT EXHIBIT A WHO WERE NOT IMMEDIATE FAMILY MEMBERS OF A 9/11 DECEDENT

(BURNETT / IRAN XV)

PLEASE TAKE NOTICE that upon the accompanying declaration of John M. Eubanks, with exhibits A through M, and the accompanying memorandum of law, the Plaintiffs identified in Exhibit A (“the *Burnett/Iran XV* Plaintiffs”) to the accompanying declaration of John M. Eubanks, respectfully move this Court for an Order entering partial final default judgments against The Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central Bank of the Islamic Republic of Iran (collectively, “the Iran Defendants”) and awarding the *Burnett/Iran XV* Plaintiffs (1) solatium damages for the losses they each suffered as a functional equivalent of an “immediate family member” of their decedents (as indicated in Exhibit A to the accompanying Declaration of John M. Eubanks) in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (3) permission for the *Burnett/Iran XV* Plaintiffs to seek punitive damages, economic damages, or other damages at a later date, and for all other *Burnett/Iran* Plaintiffs not

appearing on Exhibit A, to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs request is made in connection with the judgment on default as to liability entered against the Iran Defendants on January 31, 2017. 15-cv-9903 ECF No. 85.

Dated: January 3, 2020

Respectfully submitted,

MOTLEY RICE LLC

/s/ John M. Eubanks

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